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CLERK, U.S. DISTRICT COURT
1/22/25
CENTRAL DISTRICT OF CALIFORNIA
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

2:25-cv-00595-RGK(MAAx)

Kimberly Clisbee and Christopher Co

Complaint: Civil action for damages

vs

Cause of action: Fraud, Negligence, conspiracy
against rights, the color of the law crimes,
personal injury, other civil rights violations

Kathryn Barder, Gavin Newsom, Rob
Bonta, Stephen Morgan, State of California,
County of Los Angeles, Department of Health
and Human Services, LA County Department of
Public Health – Children’s Medical Services,
Department of Developmental Services, DOJ,
Edward Bloch, Mark Krieger, James Lee, Leigh
Ramos Platt, Racheal Thompson, Joyce Wu,
Anat Erdreich-Epstein, Arie Fallah, Children’s
Hospital Los Angeles, UC Regents, City of
Palmdale, City of Los Angeles, Palmdale School
District, Raul Maldonado, Donna Campbell,
Aaron Yoscovitz, AV SELPA, El Dorado
SELPA, North Los Angeles County Regional
Center, LAPD, LASD, OIG

In accordance with the Federal Tort Act, False
Claim Act, Federal Policy for the Protection of
Human Subjects (Common Rule), Belmont
Papers, Protection of Human Subjects in
Medical Experimentation Act, 18 U.S. Code §
241, Civil Rights Act of 1964, Brown vs. The
Board of Education, Rights of the Revolution,
official oppression, Marsy’s law, Anti-kick-back
Statute, Civil Monetary Penalties Law, Section
1983 of the U.S. Code, Nuremberg Code, 1st,
7th, 13th, and 14th amendment, 18 U.S.C. §
208

Original filing date: 1/22/2025

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1 INTRODUCTION

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3 I reserve the right to withhold the details of this complaint until the trial begins due to numerous acts
4 of judiciary misconduct and fraud that have blocked my access to a jury, which is required by the 7th
5 Amendment and Rule 38 of Federal proceedings. This misconduct has gone on for several years, and the
6 defense's retaliation has injured my family and me. It is forcing us to live under color-of-the-law crimes
7 and reducing, withholding, and controlling fundamental rights to prevent access to justice.
8

9
10 **Hobbs Act** (18 U.S.C. § 1951): Interfering with commerce by threats or violence, including
11 attempts to influence a federal trial through fraud or intimidation, is a crime.
12

13 This crime is ongoing, and the defendants are aware of why we are taking them to court. We
14 will not let them use the contents of the complaint to stall or prevent access to our 7th and 14th
15 Amendment rights as they have for three years.
16

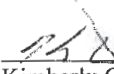
17
18 I will state the statute of limitations was reset to August 30th, 2024, resulting from a medical
19 board review that determined no malpractice was committed in either victim because no surgery was
20 ever needed, and no illness existed. "Surgery due to race or some fraudulent purpose is not a medical
21 condition. It requires law enforcement intervention."
22

23
24 Also, three investigations, one by the County Department of Public Social Services director,
25 one by the State Department of Developmental Services Ombudsman, and one by the La County
26 Office of Civil Rights, took place between April 2024 and July 2024 and confirmed that our injuries
27 were a result of the crime. They required intervention by Rob Bonta, the DOJ, and Kathryn Barger,
28

1 all participants in the fraud, and all refused to assist. They even permitted color-of-law crimes,
2 including death threats and judiciary misconduct, to prevent access to a jury demand. There are over
3 sixty-eight witnesses, three victims, and dozens of crimes of various types and degrees over fifteen
4 years, including officials and doctors, and a jury is legally the only appropriate method of resolution
5 according to Rule 38 of Federal Proceeding.
6

7
8
9
10 I declare under penalty of perjury under the laws of the State of California that the foregoing is true
11 and correct and that this declaration was executed on January 22, 2025, in Palmdale, California.
12

13
14 Date: 1/22/2025

13 
14 Kimberly Clisbee

15
16 Date: 1/22/2025

15 
16 Christopher CO

1
2 **PRAYER FOR RELIEF**

3 WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

- 4 1. The plaintiffs will receive one hundred fifty million dollars in financial damages in the
5 settlement, including triple damages fraud.
6
7 2. Punitive actions the jury sees fitting.

8
9
10 I declare under penalty of perjury under the laws of the State of California that the foregoing is true
11 and correct and that this declaration was executed on January 22, 2025, in Palmdale, California.

12 Christopher Co

13 Christopher Co

14 Kimberly Clisbee

15 Kimberly Clisbee

Proof Of Service

I, the undersigned, declare I am a resident of Los Angeles, State of California, acting as
pro per I am over the age of eighteen (18) years and not a party to the action; my business
the address is 3531 Springridge Way, Palmdale, California, 93551

On January 21st, 2025, I served the within:

Complaint

D By sending a true copy thereof electronically to the individual(s) and electronic service
address(s) as set forth below from the electronic service address:

~ By placing a time copy thereof enclosed in a sealed envelope with a prepaid postage
thereon fully prepaid for deposit in the United States Post Office mailbox, following my
ordinary business practices for collecting and processing correspondence for mailing of
which I am readily familiar with the individual(s) and address(s) as set forth below.

D By depositing a true copy thereof enclosed in a sealed envelope with delivery fees
thereon fully prepaid in a box or other facility regularly maintained by the Federal
Express for overnight mail for collection to the individual(s) and address(s) as set
forth below.

I declare under penalty of perjury under the laws of the State of California that the foregoing is
true and correct, and that these declarations were executed on January 21, 2025, in Palmdale,
California.

Date: 1/22/2025

Kimberly Clisbee

Kimberly Clisbee

Date: 1/22/2025

Christopher CO

Christopher CO - 6 - Christopher CO